

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

MARTIN J. WALSH,)	
SECRETARY OF LABOR,)	
U.S. DEPARTMENT OF LABOR,)	
)	
Plaintiff,)	CIVIL ACTION FILE
)	NO. 4:22-cv-3246
v.)	
)	
PACKERS SANITATION SERVICES,)	
INC., LTD.,)	
)	
Defendant.)	

DECLARATION OF SHANNON REBOLLEDO

I, Shannon Rebolledo, declare under penalty of perjury, as prescribed in 28 U.S.C. § 1746, that the following is true and correct:

1. I am a Regional Enforcement Coordinator for the United States Department of Labor, Wage and Hour Division’s Chicago Regional Office. I am assigned as the ATV (Accountability, Training and Virtual Call Center) Enforcement Coordinator, which includes reviewing offices within the Region in regard to enforcement and administrative actions, coordinating and assisting in the training of Regional staff, and coordinating our virtual call center.

2. I began as a Wage and Hour Investigator in May 2005. As an investigator, I conducted investigations of employers under the various laws that Wage and Hour is charged with enforcing, including the Fair Labor Standards Act (“FLSA”). In May 2010, I became Assistant District Director for the Wichita Area Office, a position I held until July 2021, when I was promoted to my current role. I have been involved in hundreds of cases over the last seventeen years, both as lead investigator and supervisor, which had child

labor components to them. These include cases in which minors were injured, were working outside the allowed hours, or were employed in excess of the maximum daily or weekly hours standard. I now regularly train new investigators on the child labor standards as part of our national training team.

3. The statements made herein are based on my training and experience, my personal knowledge, observations made during the execution of the warrant involving Defendant (as discussed below), as well as conversations with representatives and employees of the Defendant in this matter.

The Defendant

4. Packers Sanitation Services, Inc., Ltd., which may also operate as or do business as Packers Sanitation Services, LLC, (“PSSI”) is a cleaning and sanitation company that provides contract work at meat processing facilities. The PSSI location at 515 W. 3rd Street, Grand Island, Nebraska 68801, is a workplace where PSSI currently recruits and signs up employees to work for PSSI at a meat processing facility located at 555 South Stuhr Road in Grand Island. The meat processing facility is owned and/or operated by JBS USA or one of its affiliates (“JBS”).

The Investigative Findings

5. On August 24, 2022, the Wage and Hour Division initiated an investigation of PSSI to determine whether its practices complied with the FLSA, including its child labor. I was assigned to the case to assist in speaking with minors and to document violations and/or compliance with regards to such minors’ employment.

6. Prior to opening its investigation, Wage and Hour received a referral about possible child labor violations at PSSI in Grand Island from another law enforcement

agency.

7. On August 31, 2022, I reached out to the Grand Island School District, specifically at Walnut Middle School and later Grand Island High School. We spoke with staff regarding minors potentially employed at PSSI working the overnight shift. We prepared and served an administrative subpoena for certain student information as part of our investigation into potential child labor violations. We were able to interview several confidential sources at both schools. All voiced concerns about minors within the district working overnight shifts at the local Grand Island JBS plant, indicating that it was common knowledge that minors worked at JBS overnight.

8. On September 1, 2022, Acting Director of Enforcement (“DOE”) Nancy Alcantara and I conducted surveillance at the JBS facility located at 555 South Stuhr Road. We arrived around 10:30 p.m. and remained in the parking lot conducting surveillance until approximately 1:45 a.m. We observed workers arriving at staggered times throughout the evening, mainly in small groups of two to three workers at a time. Many of the workers were dropped off at one of the two entrances and appeared to be young in age, given their stature and appearance. We identified ten to fifteen workers that appeared to be minors entering the facility. Although workers were dropped off or parked near one of two entrances, all workers that we observed entered through the main security building, signing something at the guard desk, some swiping a badge while others walked around the turnstile, and entered the plant. After midnight, we observed a wave of workers appearing to end their shift and exiting the facility. These workers were not the same workers that we observed arriving earlier in the evening. They appeared to be adults, much larger in stature, and were presumably JBS workers.

9. As part of Wage and Hour's initial investigation of PSSI, I reviewed documents from the school district regarding at least three minor children who formerly worked for PSSI at the JBS facility at 555 South Stuhr Road. I also reviewed a police report detailing a minor suffering injury as a result of their work for PSSI, and a report of abuse detailing a minor child working overnight shifts at PSSI. I spoke with someone at the school district who alleged minors were working night shifts for PSSI and was provided specific information about a minor who is currently working at PSSI during the overnight shift. I also reviewed the minors' school records and birth certificates obtained from the school district pursuant to our subpoena to confirm their ages.

10. Wage and Hour obtained warrants from U.S. Magistrate Judge Michael D. Nelson, in the District of Nebraska, authorizing Wage and Hour to inspect and enter PSSI's storefront facility at 515 W. 3rd Street, Grand Island, NE 68801, and the JBS beef production facility at 555 South Stuhr Road, Grand Island, NE 68801, and "to make an inspection and investigation into violations of the Fair Labor Standards Act, including child labor violations[]" including, but not limited to, "time records of PSSI workers and/or employees, identification documents and records reflecting the age of workers and employees of PSSI, tax records, PSSI corporate records, surveillance videos, and other records or documents as the investigators may deem necessary or appropriate." The warrant also allowed for "questioning privately any employee or agent, and the taking of photographs and videos."

Execution of the Warrants

11. On October 13, 2022, Wage and Hour executed the warrant at the JBS facility during the workers' shift. I arrived at the JBS plant at approximately 11:45 p.m. on

October 12, 2022. I conducted surveillance in the parking lot until 2:00 a.m. I was parked at one end of the parking lot and was in my vehicle alone. DOE Alcantara and Wage Hour Investigator (“WHI”) Cristina Lopez were parked at the opposite end of the parking lot. At approximately 2:00 a.m. Nancy Alcantara, WHI Tom Phelan, WHI Fatmir Kote, WHI Xiomara Martinez, WHI Edith Cardenas-Michmerhuizen, and WHI Lopez accompanied me for the inspection, as discussed below. WHI Phelan produced a copy of the warrant to the guard at the main entrance and then ultimately to Jaime Jasso, JBS Night Manager, and we were permitted entry into JBS facility after a brief delay.

12. Upon entering the plant, I waited near the door until shortly after 3:15 a.m., when we were permitted to tour the facility. DOE Alcantara, WHI Martinez, and I were lead on a tour of the harvesting floor, the coolers and freezers, and then briefly the fabrication side.

13. First, we walked through the harvesting side, which is also referred to as the kill floor. This is the part of the facility where the cattle are killed and initial processing is carried out. We saw workers scrubbing machines by hand, some workers using hoses and some carrying chemicals that they sprayed onto the machines. The environment was loud, despite our wearing earplugs, and our tour guide, PSSI Plant Manager Marina Ramirez, stressed the importance of us staying with her and walking close to her because the machinery and equipment is dangerous and there are a lot of things going on while cleaning. She said that it was her responsibility to keep us safe and stopped us multiple times throughout the tour to keep us near her.

14. On the tour through the kill floor, we saw workers who clearly looked to be minors. I took pictures of some of them spraying or scrubbing equipment. As I saw a

worker who appeared to be young, I approached them and asked their names. I wrote their names down so that when we returned to the office area, we could call them for interview. I was told by Ms. Ramirez that I needed to stop taking pictures and that I was to delete them from my phone while she watched. I explained to her that the warrant allowed for pictures and video and that I would not delete them. JBS Manager Jaime Jasso came to me shortly thereafter with the same instructions. I showed him on the warrant where it specifically stated that Wage Hour would take pictures and video. He then agreed and allowed us to proceed.

15. We made our way through the kill floor, the coolers and freezer area, and briefly walked on to the fabrication floor. The fabrication side of the facility was even louder and the area that they showed us was full of steam and had very poor visibility.

16. We returned to the office area to begin interviewing in the cafeteria. I looked at the list of names I'd written down and asked PSSI Supervisors Pedro Montanez and Beatrice Roose to bring specific workers whose names I had obtained during our tour so they could be interviewed. I requested nine workers total. One worker (Minor Child V), whose name I'd written down when I spoke to them on the kill floor, was not produced. Mr. Montanez indicated no one with that name worked there. I later reviewed records showing a copy of Minor Child V's JBS badge and emails from PSSI with Minor Child V's information in them. Minor Child V was 16-years-old according to school records and their birth certificate.

17. As we spoke with the workers during the interview process, we moved to the back of the cafeteria to try and put more space between us so that we could maintain confidentiality. Mr. Montanez, supervisor for PSSI, came and sat directly across the table

from me as I interviewed one of the workers (whom I would later identify as a minor). I instructed Mr. Montanez to please move from the area as the interview was confidential. He agreed, but continued to sit there for a few more minutes, making a show of finishing up writing something. PSSI Supervisors Montanez, Beatrice Roose, and Aida Ayala remained in the area within view of the employees throughout the evening and walked around the cafeteria during interviews. I repeated my instructions to them about not being in the area while we were interviewing, as the warrant allowed for “questioning privately of any employee or agent of PSSI.” The workers we interviewed appeared nervous and looked repeatedly at the supervisors as we interviewed them.

18. I was able to complete interviews for four workers while at the plant, and additionally spoke with several others as we walked around the plant. The majority of the workers I spoke with were later verified as being minors or having worked for PSSI as minors. As the shift came to an end for the workers, many gathered in the cafeteria because the time clock is located there. I walked around and observed more young-looking workers and asked those workers to agree to be interviewed by other Wage Hour Investigators.

19. Following the inspection at the JBS plant, around 8:00 a.m. on October 13, 2022, I arrived at the PSSI storefront located at 515 W. 3rd Street, also in Grand Island. DOE Alcantara and WHI Martinez accompanied me. I produced a copy of the warrant and served it to Linda Rodriguez, Office Coordinator. We were permitted entry into the office for the inspection of records. Pursuant to the warrant, Ms. Rodriguez gave me access to her laptop and electronic files. I made a copy of her local drive to an external hard drive. Additionally, we copied various paper files, including handwritten notes about employee usernames and passwords. Ms. Rodriguez explained that workers apply for positions on-

line, or sometimes from the storefront, as it has empty workspaces and a laptop they can use to apply online. She then copies and scans the applicant's ID and uploads it into Talent Reef, a hiring platform. She indicated that she often created or assisted in creating accounts for applicants because they may not know how to do it, which is why she had usernames and passwords for the workers. She explained that she did not keep paper copies of files, and after scanning the IDs and documents, she shredded them.

20. On October 14, 2022, I returned to the JBS facility to return books that contained copies of training documents. While we waited to enter the facility, the security guard showed us the sign-in sheet for that night, which showed many PSSI employees did not return to work following our initial visit. Additionally, when we were granted access to the plant, we saw that JBS and PSSI supervisors were wearing PPE cleaning gear, the same as we had observed the minor children wearing. They explained they had to clean that night because many workers did not come into work.

Interviews with Minor Children

21. At the JBS facility, I and my colleagues WHIs Martinez, Lopez, and Cardenas-Michmerhuizen interviewed nine workers during the 11:00 p.m. to 7:00 a.m. shift on October 13, 2022, who were either minor children or had been minors when they started working for PSSI (but now were 18 years old or older). Most interviews were conducted in one of two cafeterias located in the JBS plant. Each interviewee had a badge provided by PSSI with their name on it, in addition to a JBS badge. Each interview lasted approximately thirty minutes, and I took a picture of each minor that I interviewed immediately following the interview.

22. I speak and write Spanish fluently. As the minor children I interviewed were

not fluent English language speakers, I conducted my interviews with these minor children in Spanish.

23. The minor children interviewed were a mix of boys and girls. In general, the minor children performed cleaning work either by hand, scrubbing machinery and equipment, or with a hose. Chemicals were sprayed on the areas to be cleaned. Minors wore hard hats, ear plugs, goggles, steel toed boots, rubber pants and jackets, gloves, and a harness.

24. The investigators interviewed the following minor children in Grand Island:

- Cristina Lopez: Minor Child L
- Xiomara Martinez: Minor Child D, G, H
- Edith Cardenas-Michmerhuizen: Minor Child K
- Shannon Rebolledo: Minor Child A, B, C, D, E, F, G, I, J, M

Minor Child A

25. On September 2, 2022, I spoke with Minor Child A, as well as Minor Child A's mother and Minor Child A's sister (Minor Child D) at their home. During our interview, I was told that Minor Child A worked from 11 p.m. to 5:00 a.m. or 7:00 a.m. cleaning at the JBS plant for approximately one to two months. Minor Child A worked cleaning equipment with chemicals and was burned by the chemicals they used.

26. I reviewed a copy of Minor Child A's birth certificate, which showed Minor Child A to be 14-years-old; a JBS record with Minor Child A's picture on it; a police report detailing child abuse with a statement regarding Minor Child A's work at the plant and injuries from chemical burns; copies of Minor Child A's school registration and student profile with a photo of Minor Child A; a copy of a State of Nebraska Department of Health

and Human Services Child Abuse and Neglect Intake Sheet; Minor Child A's Talent Reef application; and a copy of duty schedule with Minor Child A's assigned area to be cleaned. The address on Minor Child A's job application matched the address on Minor Child A's student profile, and the Emergency Contact for Minor Child A both at school and on their job application are Minor Child A's mother. Additionally, photos of Minor Child A from the student profile match photos from JBS records. From those documents, I determined Minor Child A was age 13 years and eleven months old at the time they performed cleaning services for PSSI on the kill floor during an overnight shift (including on school days for more than three hours on such days and for more than eighteen hours during a week in which school was in session) at the JBS facility and sustained an injury while performing such work.

Minor Child B

27. On September 1, 2022, I interviewed Minor Child B at a Grand Island Public School. Minor Child B stated they worked for PSSI from approximately December 2021 through April 2022 while attending Walnut Middle School. Their shift was from 11:00 p.m. until 5:00 a.m., five or six days per week. Minor Child B worked cleaning the machines used to cut meat at the plant. Minor Child B was 14-years-old during the time they worked for PSSI.

28. I reviewed Minor Child B's birth certificate, which showed Minor Child B to be 14-years-old at the time of interview; a JBS record with Minor Child B's picture on it; a Nebraska State Patrol report detailing Minor Child B's overnight work for PSSI, Minor Child B falling asleep in class and/or missing class as a result of work, and injuries they sustained from chemical burns; copies of Minor Child B's school registration and student

profile with a photo of Minor Child B; a copy of a State of Nebraska Department of Health and Human Services Child Abuse and Neglect Intake Sheet; and PSSSI time records facial scans with Minor Child B's picture. The photo of Minor Child B from their student profile matched the photos from JBS and their PSSSI time records. From those documents, I could confirm Minor Child B was age 14 years and three months at the time Minor Child B performed cleaning services for PSSSI during an overnight shift (including on school days for more than three hours on such days and for more than eighteen hours during a week in which school was in session) at the JBS facility.

Minor Child C

29. On September 7, 2022, I interviewed Minor Child C by phone. Minor Child C stated they worked the night shift for PSSSI, cleaning machines used in the cutting of meat, including electric knives. Minor Child C worked approximately two to three months for PSSSI while 17-years-old.

30. I reviewed, Minor Child C's student profile, birth certificate, and a State of Nebraska Health and Human Services Child Abuse/Neglect Intake Worksheet. From those documents, I confirmed Minor Child C was age 17 years and 4 months old while working for PSSSI.

Minor Child D

31. On October 14, 2022, I interviewed Minor Child D at their home. During our interview, Minor Child D, stated they began working for PSSSI in February 2022 at age 17. Minor Child D worked from 11:30 p.m. until 6:00 a.m., six or seven days per week, cleaning by hand Area 2 on the kill floor.

32. I reviewed a JBS record with Minor Child D's picture on it; a schedule with

Minor Child D's assigned area, Minor Child D's Talent Reef application information showing the same address as Minor Child A and their mother listed as an emergency contact; and PSSI time records facial scans with Minor Child D's picture. From those documents, I confirmed Minor Child D's identity and age.

Minor Child E

33. On October 13, 2022, I interviewed Minor Child E at the JBS plant. During our interview, Minor Child E stated they were 17-years-old and began working for PSSI in March 2022. Minor Child E verbally verified their date of birth, making Minor Child E age 16 years 10 months old when hired by PSSI. Minor Child E works from 11:00 p.m. until 7:00 a.m., five or six days per week, cleaning by hand Table 1 (a conveyor belt where meat being processed passes through). They had received chemical burns while working that were treated at the plant.

34. I reviewed a JBS record with Minor Child E's picture on it; a work assignment sheet with Minor Child E's name and area assignment; a new hire email with Minor Child E's name; and PSSI time record facial scans with Minor Child E's picture. From those documents, I could determine the period of employment and job assignment for Minor Child E, which was working in the "Old Fab 1 & 2" area.

Minor Child F

35. On October 13, 2022, I interviewed Minor Child F at the JBS plant. During our interview, Minor Child F stated they are 17-years-old and had worked for PSSI since May 2022. Minor Child F verbally verified their date of birth, making Minor Child F age 16 years 11 months old when hired by PSSI. Minor Child F works cleaning Area 3 of the kill floor, specifically the chest splitter, with a hose, hot water, and chemicals. Minor Child

F works from 11:30 p.m. until 7:00 a.m., five to seven days per week.

36. I reviewed a JBS record with Minor Child F's picture on it; a list with their name and assigned area on it; PSSI time records facial scans with Minor Child F's picture. From those documents, I confirmed Minor Child F's period of employment and job assignments.

Minor Child G

37. On October 15, 2022, I contacted Minor Child G (who was originally interviewed by WHI Martinez at the JBS plant) for a follow-up interview. Minor Child G stated they are currently 18-years-old, but began working for PSSI approximately eleven months prior when they were 17.

38. I reviewed a JBS record with Minor Child G's picture on it; a list with their name and assigned area on it; PSSI time records facial scans with Minor Child G's picture. From those documents, I could determine the period of employment and job assignment for Minor Child G, which was working in the "New Fab" area.

Minor Child I

39. On October 13, 2022, I interviewed Minor Child I at the JBS plant. During our interview, Minor Child I stated they are currently 18-years-old, but began working for PSSI five months before at the age of 17. Minor Child I recently quit high school because they were too tired from working. Minor Child I works cleaning in Area 3 of the kill floor.

40. I reviewed a birth certificate for Minor Child I; a student profile that shows Minor Child I's picture and address, which matches the address presented at the time of interview; a JBS record with Minor Child I's picture on it; a schedule with job assignments showing where in the plant Minor Child I worked. From those documents, I confirmed the

identity of Minor Child I and that they were age 17 years and 9 months old when Minor Child I began employment with PSSI cleaning on the kill floor.

Minor Child J

41. On October 13, 2022, I interviewed Minor Child J. During our interview, Minor Child J stated they are currently 18-years-old, but began working at PSSI in 2020 at the age of 16. Minor Child J verbally verified their date of birth and age at time of hire. Minor Child J works in the Freezer/Cooler area cleaning machines that cut meat.

42. I reviewed a JBS record with Minor Child J's picture on it; the photo I took of Minor Child J at the plant following our interview; a schedule with job assignments showing where in the plant Minor Child J worked. From those documents, I confirmed period of employment and work assignments for Minor Child J.

Minor Child K

43. Minor Child K was originally interviewed by WHI Cardenas-Michmerhuizen at the JBS plant.

44. I reviewed a student profile with Minor Child K's picture on it; a JBS record with Minor Child K's picture on it and PSSI time record facial scans, both of which match the student profile picture; and Minor Child K's application in Talent Reef, which contained the same address and phone number as their student profile. From those documents, I determined Minor Child K was 16 years and 5 months old when hired by PSSI in late 2021. Based on a schedule with job assignments, we know Minor Child K cleaned in the New Fab area.

Minor Child M

45. On October 14, 2022, I interviewed Minor Child M outside of Grand Island

High School. During our interview, Minor Child M stated they are 17-years-old. Minor Child M worked for approximately two weeks at PSSI, cleaning on the kill floor. Minor Child M stated they attend school with many other students who also work for PSSI.

46. I reviewed Minor Child M's birth certificate and student profile. From those documents, I could determine Minor Child M's age at time of employment. Minor Child M was 17 years and 5 months old at time of employment.

Minor Child N

47. Wage and Hour has not been able to interview Minor Child N yet.

48. I reviewed Minor Child N's birth certificate; a student profile with Minor Child N's picture on it; a JBS record with Minor Child N's picture on it, which matches the student profile picture; and termination paperwork from PSSI showing the last day worked by Minor Child N. From those documents, I determined Minor Child N was 16 years and 2 months old when hired by PSSI.

49. Wage and Hour is still reviewing documents to determine where in the facility Minor Child N worked. However, from my review of records provided by JBS, as well as my tour of the facility, it appears each area of plant cleaned by PSSI workers contained "meat and bone cutting saws" or other dangerous power-driven machines.

Minor Child O

50. Wage and Hour has not been able to interview Minor Child O yet.

51. I reviewed the birth certificate of Minor Child O; the student profile with Minor Child O's picture on it; a JBS record with Minor Child O's picture on it, which matches the student profile picture; a pay statement; and W-2, the address on which matched that on the student profile. From those documents, I determined Minor Child O

was 17 years and 10 months old when hired by PSSI in late 2019.

52. Wage and Hour is still reviewing documents to determine where in the facility Minor Child O worked. However, from my review of records provided by JBS, as well as my tour of the facility, it appears each area of plant cleaned by PSSI workers contained “meat and bone cutting saws” or other dangerous power-driven machines.

Minor Child U

53. Wage and Hour has not been able to interview Minor Child U yet.

54. I reviewed the birth certificate of Minor Child U; the student profile with Minor Child U’s picture on it; a JBS record with Minor Child U’s picture on it, which matches the student profile picture; and Minor Child U’s application in Talent Reef, which contained the same phone number, address, and emergency contact as their student profile. From those documents, I determined Minor Child U was 16 years and 2 months old when hired by PSI in early 2022.

55. According to documents I reviewed showing PSSI employee assignments, Minor Child U works on the Old Fabrication side of the plant.

Minor Child V

56. Wage and Hour has not been able to interview Minor Child V yet.

57. I identified Minor Child V as young looking during my tour of the establishment, wrote down their name, and requested to speak to them. I was told there was no one by that name employed with PSSI. During a review of records from PSSI, I found Minor Child V’s name and picture.

58. I reviewed the birth certificate of Minor Child V; a student profile with Minor Child V’s picture; a JBS record with Minor Child V’s picture on it, which matches

the student profile picture; Minor Child V's application in Talent Reef, which contained the same address and phone number as their student profile; and a work assignment sheet with Minor Child V's name and assignment to work on the kill floor. From those documents, I determined Minor Child V is 16-years-old and is assigned to clean on the kill floor.

Minor Child W

59. Wage and Hour has not been able to interview Minor Child W yet.

60. I reviewed a student profile with Minor Child W's picture; a JBS record with Minor Child W's picture on it and PSSSI time record facial scans, both of which match the student profile picture; Minor Child W's application in Talent Reef, which contained the same address, phone number, and emergency contact as their student profile; and a work assignment sheet with Minor Child W's name and assignment to work on the kill floor. From those documents, I determined Minor Child W began working for PSSSI as a 15-year-old, is currently 16-years-old, and is assigned to clean on the kill floor.

Minor Child X

61. Wage and Hour has not been able to interview Minor Child X yet.

62. I reviewed a student profile with Minor Child X's picture; a JBS record with Minor Child X's picture on it and PSSSI time record facial scans, both of which match the student profile picture; and Minor Child X's application in Talent Reef, which contained the same phone number as their student profile and includes an email address composed of Minor Child X's real name. Minor Child X's application also identified a previous period of employment with PSSSI when Minor Child X worked on the kill floor. From those documents, I determined Minor Child X was initially hired by PSSSI as a 16-year-old.

Minor Child Y

63. Wage and Hour has not been able to interview Minor Child Y yet.

64. I reviewed Minor Child Y's birth certificate; a student profile with Minor Child Y's picture; a JBS record with Minor Child Y's picture on it and PSSSI time record facial scans, both of which match the student profile picture; and Minor Child Y's application in Talent Reef, which contained the same address as their student profile and includes an email address composed of Minor Child Y's real name. From those documents, I determined Minor Child Y began working for PSSSI as a 16-year-old. Wage and Hour is still reviewing documents to determine where in the facility Minor Child Y worked. However, from my review of records provided by JBS, as well as my tour of the facility, it appears each area of plant cleaned by PSSSI workers contained "meat and bone cutting saws" or other dangerous power-driven machines.

Minor Child Z

65. Wage and Hour has not been able to interview Minor Child Z yet.

66. I reviewed Minor Child Z's birth certificate; a student profile with Minor Child Z's picture; a JBS record with Minor Child Z's picture on it and PSSSI time record facial scans, both of which match the student profile picture; Minor Child Z's application in Talent Reef, which contained the same address and phone number as their student profile and includes an email address composed of Minor Child Z's real name. From those documents, I determined Minor Child Z began working for PSSSI as a 17-year-old. Wage and Hour is still reviewing documents to determine where in the facility Minor Child Z worked. However, from my review of records provided by JBS, as well as my tour of the

facility, it appears each area of plant cleaned by PSSI workers contained “meat and bone cutting saws” or other dangerous power-driven machines.

Minor Child AA

67. Wage and Hour has not been able to interview Minor Child AA yet.

68. I reviewed Minor Child AA’s student profile; a JBS record with Minor Child AA’s picture on it and PSSI time record facial scans, both of which match the student profile picture; Minor Child AA’s application in Talent Reef, which contained the same address and emergency contact as their student profile; and a work assignment sheet with Minor Child AA’s name and assignment to work on the kill floor. From those documents, I determined Minor Child AA began working for PSSI as a 15-year-old, is currently 17-years-old, and is assigned to clean on the kill floor.

Minor Child BB

69. Wage and Hour has not been able to interview Minor Child BB yet.

70. I reviewed Minor Child BB’s birth certificate; Minor Child BB’s student profile; a JBS record with Minor Child BB’s picture on it and PSSI time record facial scans, both of which match the student profile picture; Minor Child BB’s application in Talent Reef, which uses Minor Child BB’s real name and contained the same address as two other minors who work for PSSI; and a work assignment sheet with Minor Child BB’s name and assignment to work in the Meat Master area. From those documents, I determined Minor Child BB began working for PSSI as a 16-year-old, and at 17-years-old was assigned to clean in an area containing numerous meat grinders.

Minor Child CC

71. Wage and Hour has not been able to interview Minor Child CC yet.

72. I reviewed Minor Child CC's birth certificate; a student profile with Minor Child CC's picture; a JBS record with Minor Child CC's picture on it, which matched the student profile picture; and a work assignment sheet with Minor Child CC's name and assignment to work in the Ground Beef area. From those documents, I determined Minor Child CC began working for PSSI as a 17-years-old, and they are assigned to clean in an area that contains numerous meat grinders.

Minor Child DD

73. Wage and Hour has not been able to interview Minor Child DD yet.

74. I reviewed Minor Child DD's birth certificate; a student profile with Minor Child DD's picture; a JBS record with Minor Child DD's picture on it and PSSI time record facial scans, both of which match the student profile picture; and Minor Child DD's application in Talent Reef. From those documents, I determined Minor Child DD began working for PSSI as a 16-year-old. Wage and Hour is still reviewing documents to determine where in the facility Minor Child DD worked. However, from my review of records provided by JBS, as well as my tour of the facility, it appears each area of plant cleaned by PSSI workers contained "meat and bone cutting saws" or other dangerous power-driven machines.

Executed on this 7th day of November, 2022.



Shannon Rebolledo
Regional Enforcement Coordinator
Wage and Hour Division
U.S. Department of Labor